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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

December 8, 1992

OUR FILE NO.
0250-120-60

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554


Re: Beverly Hills, Florida
MM Docket No. 92-195

Dear Ms. Searcy:

Transmitted herewith, on behalf of Sarasota-FM, Inc. and Gator Broadcasting Corporation, are an original and four copies of their Supplemental Comments in the above-captioned proceeding. This Supplement is filed for the limited purpose of replacing the facsimile of the engineering statement of Mr. Richard S. Graham with the original.

Please contact the undersigned directly if there are any questions concerning this matter.

Sincerely yours,



David G. O'Neil

DGO:do
Enclosures

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before The
Federal Communications Commission
Washington, D.C. 20554

In The Matter Of

Amendment of Section 73.202(b)
FM Table of Allotments
FM Broadcast Stations
(Beverly Hills, Florida)

MM Docket No. 92-195
RM-7146

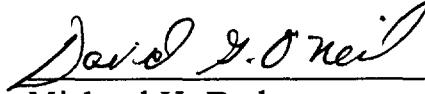
TO: Chief, Allocations Branch
Policy and Rules Division

**Supplemental Comments of Sarasota-FM, Inc.
and Gator Broadcasting Corporation**

Sarasota-FM, Inc. ("SFI"), licensee of FM Radio Broadcast Station WSRZ, Sarasota, Florida, and Gator Broadcasting Corporation ("Gator"), licensee of FM Radio Broadcast Station WRRX, Micanopy, Florida (collectively, "SFI/Gator"), by their respective attorneys, hereby submit this Supplement to the **"Reply Comments of Sarasota-FM, Inc. and Gator Broadcasting Corporation"** filed on December 7, 1992. This Supplement is filed for the limited purpose of replacing the facsimile of the engineering statement of Mr. Richard S. Graham with the original appended hereto. The facsimile, transmitted by telecopy, is not in any way different from the original.

Respectfully submitted,

Sarasota-FM, Inc.

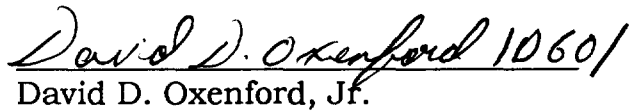


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ITS ATTORNEYS

Gator Broadcasting Corporation



David D. Oxenford, Jr.

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ITS ATTORNEY

December 8, 1992

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OFFICE OF THE SECRETARY

REPLY COMMENTS OF
SARASOTA-FM, INC.
AND GATOR BROADCASTING CORPORATION
MM DOCKET No. 92-195
RM-7146
December 1992

Technical Exhibit

TE-1

Bromo Communications, Inc.
P.O. Box M - 1331 Ocean Boulevard, Suite 201
St. Simons Island, Georgia 31522
(912) 638-5608

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REPLY COMMENTS OF
SARASOTA-FM, INC.
AND GATOR BROADCASTING CORPORATION
MM DOCKET No. 92-195
RM-7146
December 1992

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

This Technical Exhibit supports the continued reply comments of Sarasota-FM, Inc., ("SFI") and Gator Broadcasting Corporation ("GATOR") in MM Docket #92-195, RM-7146. SFI and Gator have counterproposed three alternatives to conclude the docket. These are:

Alternative One

<u>Community</u>	<u>Present</u>	<u>Proposed</u>	<u>Station</u>
Sarasota	292A	293C2	WSRZ
Holiday	292A	246C2	WLVU
Beverly Hills	246A	292A	WXOF
Micanopy	249A	247C2	WRRX
Chiefland	247A	300A	WLQH

Alternative Two

<u>Community</u>	<u>Present</u>	<u>Proposed</u>	<u>Station</u>
Sarasota	292A	293C2	WSRZ
Holiday	292A	246C2	WLVU
Beverly Hills	246A	292C3*	WXOF
Micanopy	249A	247C2	WRRX
Chiefland	247A	300A	WLQH

* - §73.213(c) spacing to WEAG, Starke, Florida

Alternative Three

<u>Community</u>	<u>Present</u>	<u>Proposed</u>	<u>Station</u>
Sarasota	292A	293C2	WSRZ
Holiday	292A	246C2	WLVU
Beverly Hills	246A	----	WXOF
Sugarmill Woods	----	292C3	----
Inverness	----	292C3	----
		[alternate to Sugarmill Woods]	
Micanopy	249A	247C2	WRRX
Chiefland	247A	300A	WLQH

Heart of Citrus, Inc., ("Citrus") had originally proposed substituting Channel 246C3 for Channel 246A, WXOF-FM, Beverly Hills, Florida, (site restricted). In their comments to MM Docket #92-195, they proposed an additional upgrade for WXOF to Channel 246C2, which required Chiefland to move from Channel 247A to Channel 300A. In effect then, Citrus has presented two alternatives:

Alternative One (Citrus counterproposal to their own docket)

<u>Community</u>	<u>Present</u>	<u>Proposed</u>	<u>Station</u>
Beverly Hills	246A	246C2	WXOF
Chiefland	247A	300A	WLQH

Alternative Two (Citrus' original proposal)

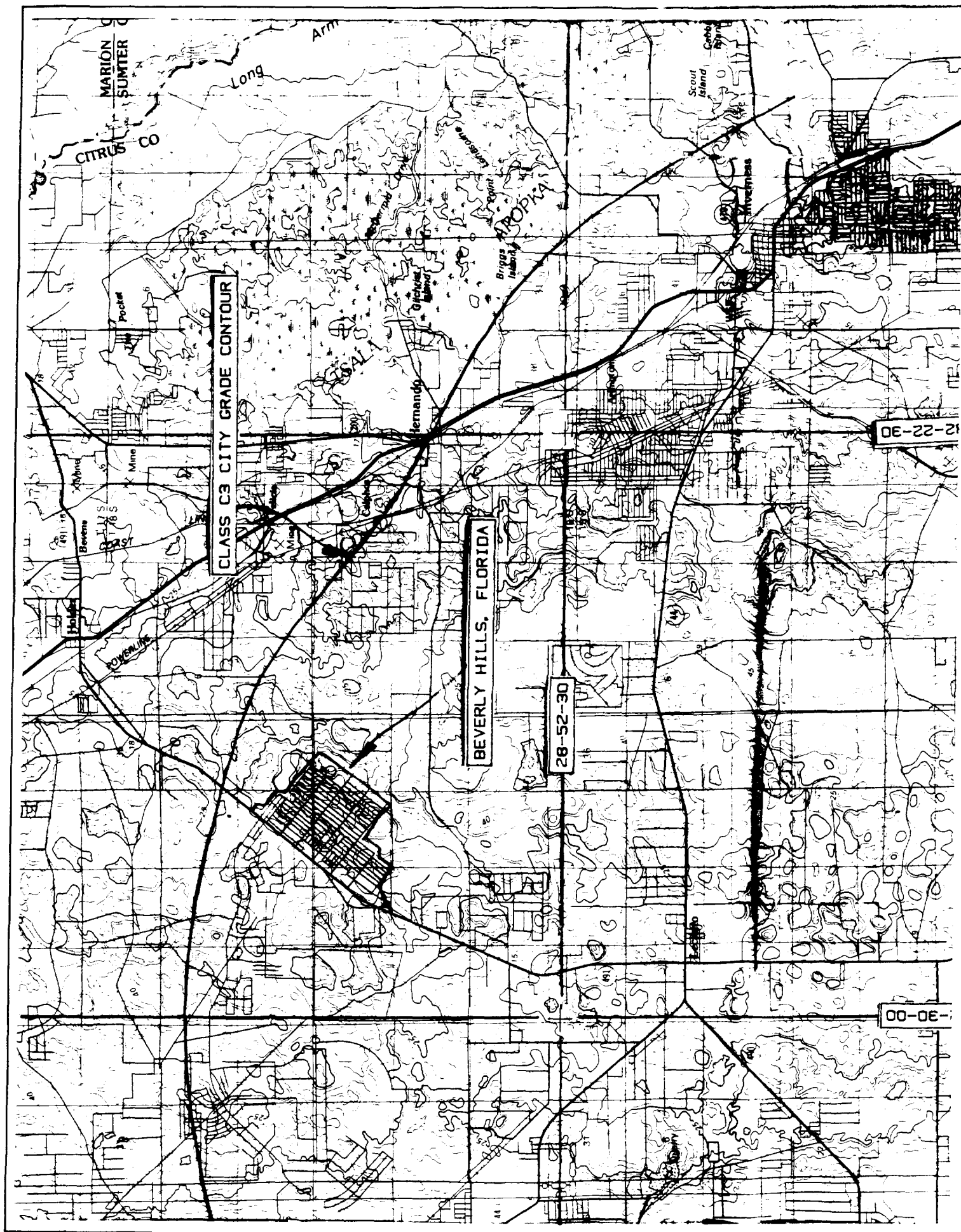
<u>Community</u>	<u>Present</u>	<u>Proposed</u>	<u>Station</u>
Beverly Hills	246A	246C3	WXOF

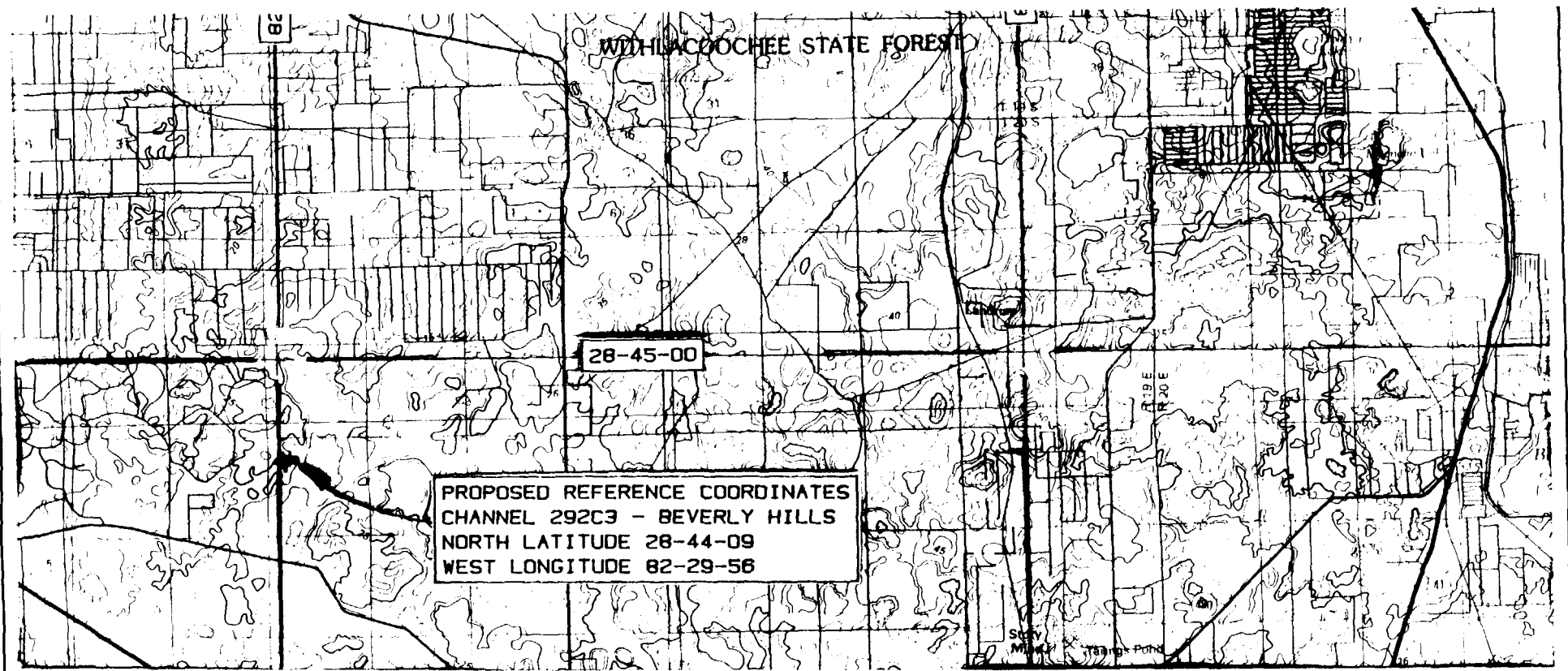
Citrus purports the site restriction, imposed by Alternative Two of the SFI/Gator counterproposal, prevents construction of a facility which would fully serve Beverly Hills. Exhibit #1 is a copy of a portion of the Inverness, 100,000 scale USGS topographic map with the SFI/Gator reference coordinates for Beverly Hills' Channel 292C3 properly located on the map. In addition, The 70 dBu (3.16 mV/m contour) for a maximum Class facility was calculated from that site and is depicted on the map. It is clear that the entire road grid area of Beverly Hills is served by the required city grade service. It is noted that Beverly Hills is a Census Designated Place and has no fixed incorporated limits as implied by Citrus.

Citrus suggests that each of their proposals result in expanded service to underserved areas. This is not, in fact, the case. Attached as Exhibit #2 is a listing of stations providing 1.0 mV/m service or greater to the general area in question. Exhibit #3 is a map of the Citrus expanded service area (their original proposal). Exhibit #4 is a map of the Citrus expanded service area under their Class C2 counterproposal for WXOF. In each case, referring to Exhibit #2, there is no underserved area to be served by either of the Citrus proposals. It appears that Citrus failed to consider Non-Commercial Educational stations and Construction Permits servicing the area. It is proper to consider Outstanding Construction

August 2, 1991. Likewise, Non-Commercial Educational stations which provide service to the area are rightfully considered as defined in the decision in MM Docket #88-259, June 10, 1992.

We have tried to be as accurate as possible in the preparation of this report. Should there be any questions concerning the information contained herein, we welcome the opportunity to discuss the matter by phone (912) 638-5608.

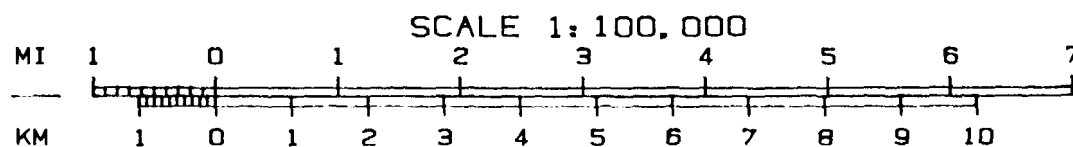




CLASS C3 CITY COVERAGE - ALTERNATIVE #2

MAP IS A PORTION OF THE USGS 100,000
SCALE TOPOGRAPHIC MAP 'INVERNESS'

EXHIBIT #1
MM DOCKET #92-195
SARASOTA FM, INC.
GATOR BROADCASTING, INC.
MICANOPY, SARASOTA,
BEVERLY HILLS, HOLIDAY
AND CHIEFLAND
FLORIDA
DECEMBER 1992



BROMO BROADCAST
COMMUNICATIONS TECHNICAL CONSULTANTS

St Simons Island, Georgia

Washington, D.C.

REPLY COMMENTS OF
SARASOTA-FM, INC.
AND GATOR BROADCASTING CORPORATION
MM DOCKET No. 92-195
RM-7146
December 1992

TERRAIN AND CONTOUR DATA
PROPOSED CLASS C3 FACILITY
BEVERLY HILLS, FLORIDA

ERP = 25 kW
FM - 2-6 Tables

Azimuth Deg T.	Ave. Elev. 3 to 16 km Meters AMSL	Effective Antenna Height Meters AAT	ERP (dBk)	F(50-50) Distance to 70 dBu Contour km
0	15.8	99.2	13.979	23.1
30	27.3	87.7	13.979	21.8
60	25.3	89.7	13.979	22.0
90	25.5	89.5	13.979	22.0
120	23.1	91.9	13.979	22.3
150	27.7	87.3	13.979	21.7
180	20.8	94.2	13.979	22.6
210	6.5	108.5	13.979	24.1
240	1.3	113.7	13.979	24.7
270	0.4	114.6	13.979	24.7
300	1.1	113.9	13.979	24.7
330	4.8	110.2	13.979	24.3
<hr/>				
Ave. = 15 M		100.0 M		

Antenna Radiation Center AMSL = 115.0 M

Geographic Coordinates:

North latitude: 28 44 09
West longitude: 82 29 56

EXHIBIT #1A
MM DOCKET #92-195
SARASOTA FM, INC.
GATOR BROADCASTING, INC.
MICANOPY, SARASOTA,
BEVERLY HILLS, HOLIDAY
AND CHIEFLAND
FLORIDA
DECEMBER 1992

BROMO COMMUNICATIONS, INC.
Broadcast Technical Consultants

ANALYSIS OF HEART OF CITRUS
UNDERSERVED AREA ANALYSIS

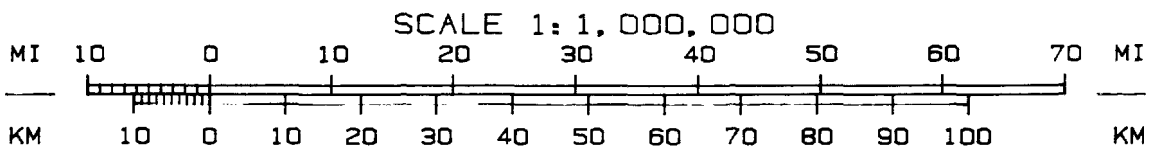
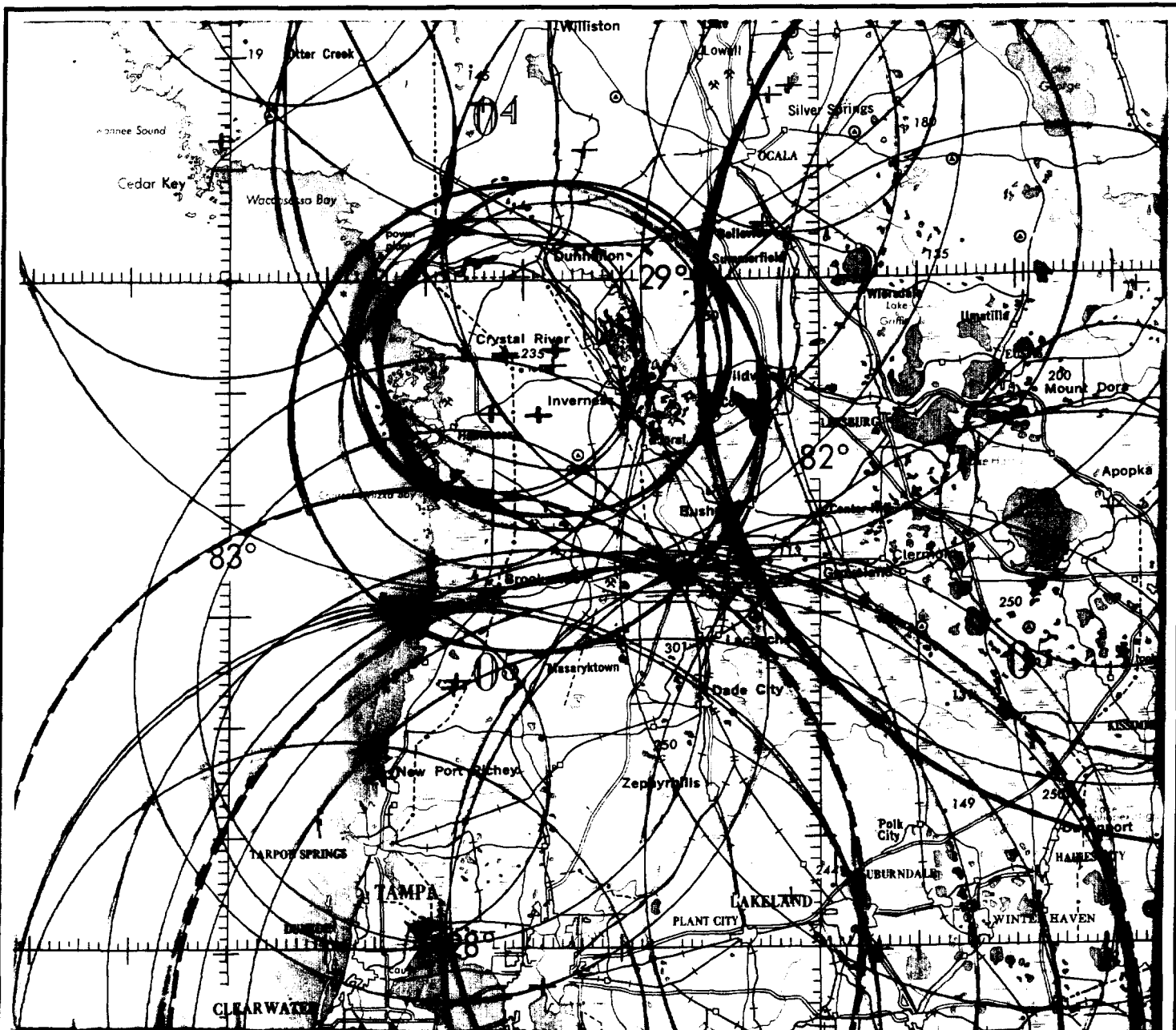
LATITUDE 28°46'42" LONGITUDE 82°28'31"

FM STATIONS WITHIN 120 KM

CHANNEL	KM	MI	BEARING	LAT / LONG	STATUS	PWR	CALL	ST	CITY
202A	12.49	(7.76)	337.2	28-52-55/ 82-31-30	CP	3.80	WLMS.C	FL	Lecanto
205C1	43.79	(27.21)	197.3	28-24- 7/ 82-36-30	CP	50.00	WYFE.C	FL	Tarpon Springs
209C1	105.43	(65.51)	168.6	27-50-53/ 82-15-48	LI	100.00	WUSF	FL	Tampa
211A	10.48	(6.51)	15.6	28-52- 9/ 82-26-47	CP	4.50	WWUA.C	FL	Inverness
213C1	109.03	(67.75)	167.8	27-49- 9/ 82-14-26	LI	100.00	WBVM	FL	Tampa
216C1	88.51	(54.99)	151.2	28- 4-46/ 82- 2-27	LI	100.00	WCIEFM	FL	Lakeland
218C2	45.00	(27.96)	197.3	28-23-30/ 82-36-45	CP	25.00	WLPJ.C	FL	New Port Richey
220A	7.52	(4.67)	286.2	28-47-50/ 82-32-58	CP	3.00	WXJC.C	FL	Crystal River
221A	71.42	(44.38)	354.2	29-25- 4/ 82-32-58	LI	1.70	WFEZ	FL	Williston
223C2	109.15	(67.82)	197.8	27-50-33/ 82-48-52	LI	50.00	WYUU	FL	Safety Harbor
225C2	49.99	(31.06)	47.9	29- 4-45/ 82- 5-35	LI	50.00	WMFQ	FL	Ocala
227C	106.08	(65.91)	168.6	27-50-32/ 82-15-46	LI	100.00	WFLZ	FL	Tampa
229C	66.58	(41.37)	35.0	29-16- 6/ 82- 4-51	LI	100.00	WMMZ	FL	Ocala
231C1	103.92	(64.57)	146.3	27-59-56/ 81-53-16	LI	100.00	WEZYFM	FL	Lakeland
233C	101.82	(63.27)	76.9	28-58-55/ 81-27-18	LI	96.00	WCFB	FL	Daytona Beach
235C	109.03	(67.75)	167.8	27-49- 9/ 82-14-26	LI	100.00	WYNFFM	FL	Tampa
237A	13.12	(8.15)	337.2	28-53-14/ 82-31-39	LI	3.00	WXCW	FL	Homosassa Springs
237A	96.61	(60.03)	98.1	28-39- 8/ 81-29-40	LI	3.00	WTLNFM	FL	Apopka
238A	69.72	(43.32)	36.5	29-16-55/ 82- 2-50	LI	3.00	WGGOFM	FL	Silver Springs
239C1	102.34	(63.59)	188.2	27-52- 0/ 82-37-27	LI	100.00	WMTXFM	FL	Clearwater
247A	91.23	(56.69)	334.2	29-30-60/ 82-53-11	CP	6.00	WLQHF	FL	Chiefland
248C	115.78	(71.94)	128.5	28- 7-35/ 81-33- 3	LI	100.00	WPCV	FL	Winter Haven
250C1	84.01	(52.20)	192.2	28- 2-21/ 82-39-21	LI	100.00	WXTB	FL	Clearwater
253C	54.14	(33.64)	350.5	29-15-32/ 82-34- 3	LI	100.00	WKTK	FL	Crystal River
258C1	92.36	(57.39)	179.1	27-56-50/ 82-27-35	LI	100.00	WQYKFM	FL	St. Petersburg
264C1	84.01	(52.20)	192.2	28- 2-21/ 82-39-21	LI	100.00	WUSAFM	FL	Tampa
268C	106.08	(65.91)	168.6	27-50-32/ 82-15-46	LI	100.00	WKES	FL	St. Petersburg
270C1	113.63	(70.61)	81.7	28-55-16/ 81-19- 9	LI	28.00	WJHM	FL	Daytona Beach
272C2	46.17	(28.69)	9.8	29-11-16/ 82-23-39	LI	50.00	WTRSF	FL	Dunnellon
274C3	70.77	(43.98)	312.4	29-12-24/ 83- 0-51	CP	25.00	WVNM.C	FL	Cedar Key
279C1	103.76	(64.47)	4.3	29-42-34/ 82-23-40	LI	100.00	WRUFFM	FL	Gainesville
284C1	92.36	(57.39)	179.1	27-56-50/ 82-27-35	LI	100.00	WRBQFM	FL	Tampa
288A	62.91	(39.09)	203.5	28-15-32/ 82-43-54	CP	6.00	WGULFM	FL	New Port Richey
288A	94.90	(58.97)	3.1	29-37-52/ 82-25-18	LI	3.00	WYKS	FL	Gainesville
290C	113.63	(70.61)	81.7	28-55-16/ 81-19- 9	LI	100.00	WOCL	FL	Deland
294C1	89.33	(55.51)	105.6	28-33-31/ 81-35-38	LI	100.00	WXXL	FL	Leesburg
297C1	103.44	(64.27)	188.1	27-51-24/ 82-37-26	LI	100.00	WWRM	FL	St. Petersburg
299C	113.63	(70.61)	81.7	28-55-16/ 81-19- 9	LI	100.00	WMGF	FL	Mount Dora

Note: Stations on Channels 201-220 considered as authorized
Class C stations considered as authorized
Class A, C3, C2, C1 stations considered at maximum facility

EXHIBIT #2
MM DOCKET #92-195
SARASOTA FM, INC.
GATOR BROADCASTING, INC.
MICANOPY, SARASOTA,
BEVERLY HILLS, HOLIDAY
AND CHIEFLAND
FLORIDA
DECEMBER 1992

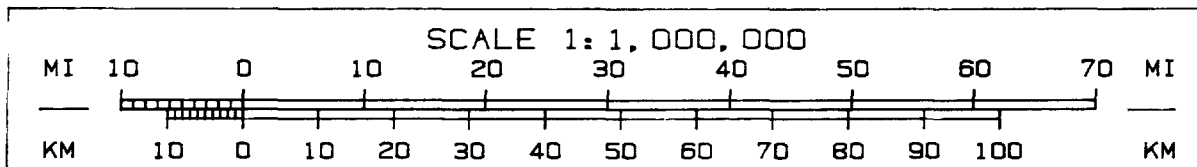
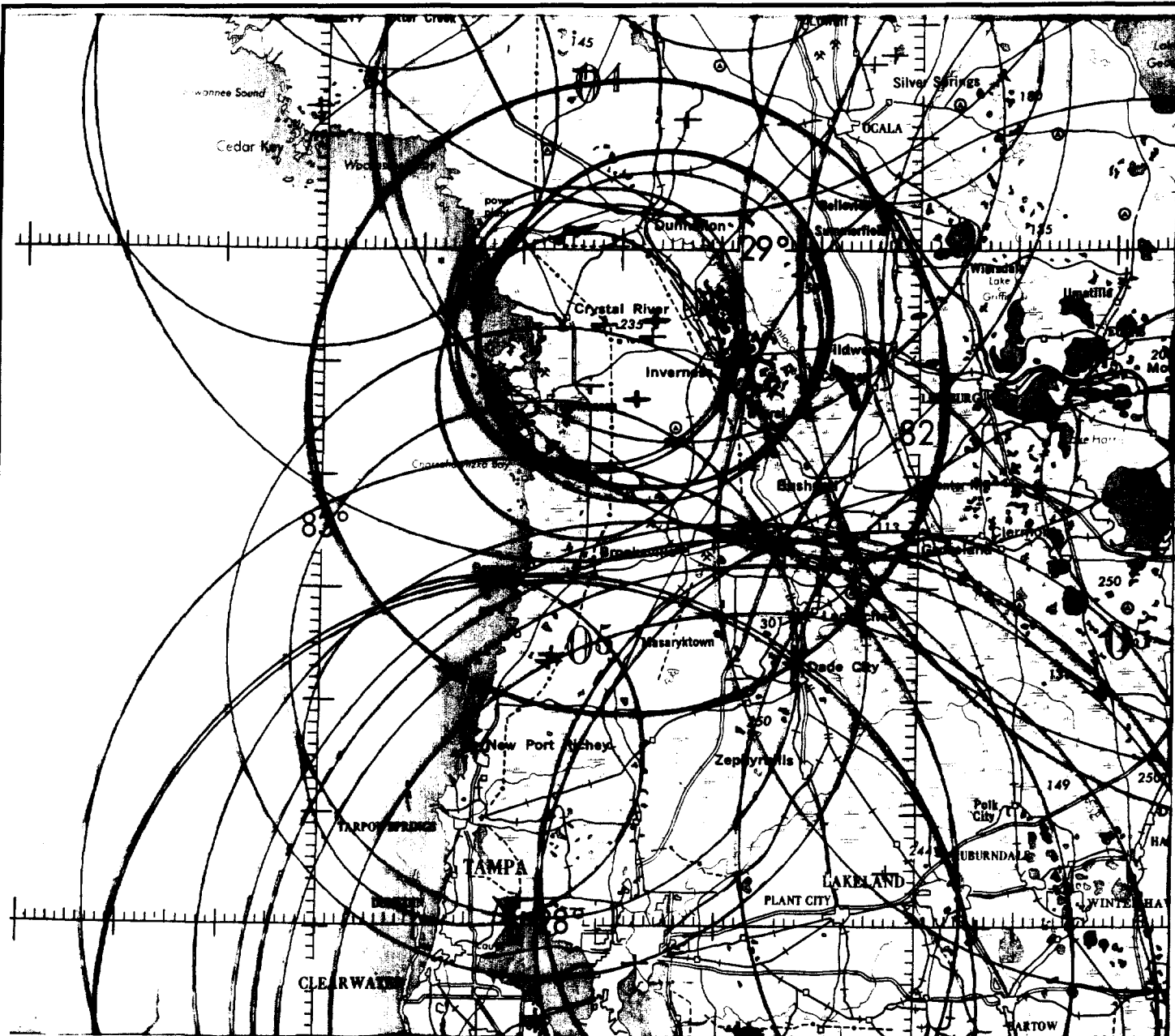


AREA SERVICE STUDY - 246C3

MAP IS A PORTION OF THE 1,000,000 SCALE
WAC AERONAUTICAL CHART CH-25

EXHIBIT #3
MM DOCKET #92-195
SARASOTA FM, INC.
GATOR BROADCASTING, INC.
MICANOPY, SARASOTA,
BEVERLY HILLS, HOLIDAY
AND CHIEFLAND
FLORIDA
DECEMBER 1992

BROMO
COMMUNICATIONS
BROADCAST
TECHNICAL CONSULTANTS
St Simons Island, Georgia
Washington, D.C.



AREA SERVICE STUDY - 246C2

MAP IS A PORTION OF THE 1,000,000 SCALE
WAC AERONAUTICAL CHART CH-25

EXHIBIT #4
MM DOCKET #92-195
SARASOTA FM, INC.
GATOR BROADCASTING, INC.
MICANOPY, SARASOTA,
BEVERLY HILLS, HOLIDAY
AND CHIEFLAND
FLORIDA
DECEMBER 1992

BROMO BROADCAST
COMMUNICATIONS TECHNICAL CONSULTANTS
St Simons Island, Georgia Washington, D.C.

AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT

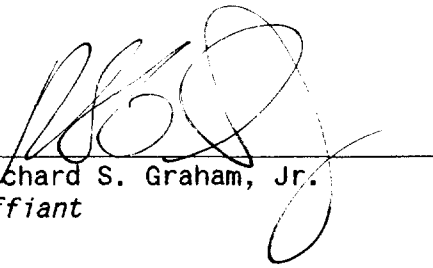
*State of Georgia)
St. Simons Island) ss:
County of Glynn)*

RICHARD S. GRAHAM, JR. being duly sworn, deposes and says that he is an officer of Bromo Communications, Inc. Bromo has been engaged by Sarasota-FM, Inc., and Gator Broadcasting Corporation to prepare the attached Technical Exhibit.

His qualifications are a matter of record before the Federal Communications Commission. He is a graduate of Auburn University and has been active in broadcast engineering since 1972.

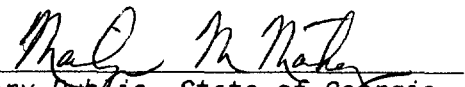
The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

This the 7th day of December, 1992.



Richard S. Graham, Jr.
Affiant

*Sworn to and subscribed before
me this the 7th day of December, 1992.*



Notary Public, State of Georgia
My Commission Expires: September 8, 1995

CERTIFICATE OF SERVICE

The undersigned, an employee of Haley, Bader & Potts, hereby certifies that the foregoing document was mailed this date by First Class U.S. Mail, postage prepaid, or was hand-delivered*, to the following:

*Michael C. Ruger, Chief
Allocations Branch, Policy & Rules Division
Federal Communications Commission
2025 M Street, N.W.
Room 8318
Washington, D.C. 20554

*Robert Hayne
Mass Media Bureau
Federal Communications Commission
2025 M Street, N.W.
Room 8337
Washington, D.C. 20554

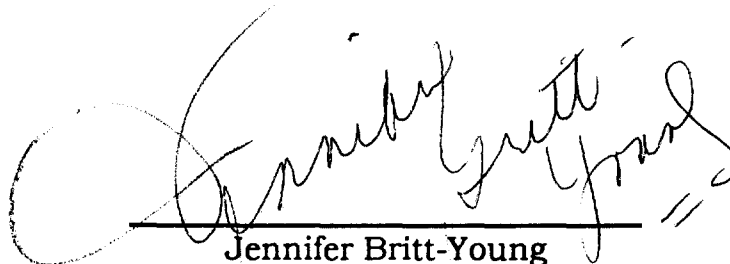
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Counsel for WGUL-FM, Inc. and
Roper Broadcasting, Inc.



Jennifer Britt-Young

*Hand Delivered

December 8, 1992